

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

SHANGHAI TENCENT PENGUIN FILM
CULTURE MEDIA CO., LTD.; SHENZHEN
TENCENT COMPUTER SYSTEM CO.,
LTD.; and TENCENT TECHNOLOGY
(BEIJING) CO., LTD.,

Plaintiffs,

v.

UNBLOCKTECH, et al.,

Defendants.

CIVIL NO. 6:23-CV-300-ADA-JCM

**PLAINTIFFS' MOTION FOR DEFAULT JUDGMENT AGAINST DEFENDANTS
UNBLOCKTECH, DALI TONGDA TECHNOLOGY LIMITED, HK-UB, UNBO STORE-
USA, AND HOPE OVERSEAS**

Plaintiffs Shanghai Tencent Penguin Film Culture Media Co., Ltd., Shenzhen Tencent Computer System Co., Ltd, and Tencent Technology (Beijing) Co., Ltd. by and through their undersigned counsel, hereby move for default judgment against Defendants UnblockTech Taiwan Co., Ltd., Dali Tongda Technology Limited, HK-UB, Unbo Store, and Hong Kong Hope Overseas Trading Co., Ltd. pursuant to Federal Rule of Civil Procedure 55(b). The grounds for Plaintiffs' motion are fully set forth in the Opening Brief, and the exhibits attached thereto, filed contemporaneously herewith and the papers, records, and pleadings on file with the Court.

Dated: November 25, 2024

Respectfully submitted,

/s/ Chao Wang

Chao Wang, Bar No. 289325 (*pro hac vice*)

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on November 25, 2024 to all counsel of record, via the Court's CM/ECF system.

/s/ Chao Wang

Chao Wang